

IN THE UNITED STATES DISTRICT COURT  
FOR THE OF ARIZONA

IN RE BARD IVC FILTERS )No. MD-15-02641-PHX-DGC  
PRODUCTS LIABILITY LITIGATION )  
This Document Relates to all Cases )**STIPULATION OF DISMISSAL WITH**  
(See Exhibit A) )**PREJUDICE**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto  
("Plaintiffs") and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc.  
("Defendants"), and file this Stipulation of Dismissal with Prejudice, and in support  
thereof, respectfully show the Court as follows:

Pursuant to Rule 41(a)(1)(A)(ii), Federal Rules of Civil Procedure, Plaintiffs and  
Defendants hereby stipulate to the dismissal of the cases listed on Exhibit A with  
prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are  
to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby  
respectfully request that the Court dismiss the cases listed on Exhibit A in their entirety  
with prejudice to the re-filing of same and order that these parties are to bear their own  
costs.

RESPECTFULLY SUBMITTED October 20, 2020.

By: /s/ Richard S. Lewis  
Richard S. Lewis  
Steven Rotman

HAUSFELD LLP  
1700 K Street NW, Suite 650  
Washington, DC 20006  
Telephone: (202) 540-7200  
Facsimile: (202) 540-7201  
Email: [rslewis@hausfeld.com](mailto:rslewis@hausfeld.com)  
[srotman@hausfeld.com](mailto:srotman@hausfeld.com)

and

Rachel Abrams  
LEVIN SIMES LLP  
1700 Montgomery Street, Suite 250  
San Francisco, CA 94111  
Telephone: (415) 426-3000  
Facsimile: (415) 426-3001  
Email: [rabrums@levinsimes.com](mailto:rabrums@levinsimes.com)

**ATTORNEYS FOR PLAINTIFFS**

/s/ Richard B. North, Jr.  
Richard B. North, Jr.  
NELSON MULLINS RILEY &  
SCARBOROUGH LLP  
201 17<sup>TH</sup> St. NW, Ste. 1700  
Atlanta, GA 30363  
Telephone: (404) 322-6000  
Facsimile: (404) 332-6397  
Email: [Richard.north@nelsonmullins.com](mailto:Richard.north@nelsonmullins.com)

**ATTORNEY FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that on October 20, 2020, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Richard S. Lewis

Richard S. Lewis